considered the highest voltage achievable in the rotating machine art. High voltage around 10-20 kV, and although it may be somewhat higher it is usually not higher than 30 kV. In the art of high voltage transmission and distribution, high voltage is on the order of hundreds of kV. Thus, the term has a meaning when examined in context. Applicants have made a machine which operates at high voltage in the transmission and distribution context. This is why Shildneck and the other references are inapplicable. None of the references show or suggest that a flexible cable for high voltage distribution could be employed in a rotating machine to allow such machine to operate at a corresponding high voltage. The references do not suggest such high voltage would be advantageous, nor do they show a need for such high voltage operation.

Evans does not operate as suggested by the Examiner. If Evans is employed as suggested by the Examiner, then there would be three separate conductors employed in each phase. The insulation provided for the strands in the conductor forming each phase in the invention is not to separate phases, but is to provide inter strand insulation to prevent currents from migrating between strands. The outer insulation in the invention provides insulation to ground between the phases, and the phases are separate. In contrast, Evans has three phases which are separately insulated from each other and ground, and in addition the phases are combined in one outer covering. The three separate phases in the invention are wound separately, whereas the arrangement of Evans would have to be wound together. Such an arrangement would be inoperable in a rotating machine. It would also be too big and cumbersome. The only way to use Evans would be to disassemble the outer covering and make three separate cables. It is submitted that such an arrangement would not be obvious, much less practical.

Applicants believe that the reference is not reasonably pertinent to the problem and thus not properly relied on by the Examiner.

The fact that Elton employs semi-conductive material to reduce corona discharge is not pertinent to the invention. In Elton, the semi-conducting material is employed with a conventional hard or stiff bar type winding to control corona discharge in the end winding region. Yet Elton requires a complex structure to control the end winding region as suggested by the drawing figures showing the convoluted structure in the conventional machine. The cable embodiment in Elton is for a transmission and distribution or a power cable. However, there is no suggestion that the cable of Elton could be substituted for the conventional winding to make a high voltage machine. The Examiner's jump to combine the references goes too far. The Elton reference itself does not suggest the advantage of having a machine with a high voltage output other than conventional high voltage operation for rotating machines. In the same reference, Elton employs a semi-conductor for power cables. Elton never suggests that it would be useful or advantageous to substitute one for the other, because Elton does not recognize the possibility of such arrangement. The Applicants believe that the Examiner arrives at his conclusion based on the teachings gleaned from Applicants' disclosure, which amounts to impermissible hindsight.

If the filing of this paper requires an extension, Applicants hereby request such extension and authorize the Commissioner to charge Deposit Account 04-2223 for any required fee or to deposit any refund in said account.

Respectfully submitted,

DYKEMA GOSSETT PLIO

John P. De Luca, Registration No. 25,505

Attorney for Applicants

DYKEMA GOSSETT PLLC

1300 I Street N.W. Suite 300 W Washington, D.C. 20005 (202) 906-8600